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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

Facility Equipment and Requirements (Section D)

This section consists of a table listing all permitted equipment at the facility, facility wide requirements, all individual Permits to Construct and Permits to Operate issued to various equipment at the facility, and Rule 219-exempt equipment subject to source-specific requirements. Each permit and Rule 219-exempt equipment will list operating conditions including periodic monitoring requirements, and applicable emission limits and requirements that the equipment is subject to. Also included is the rule origin and authority of each emission limit and permit condition.

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

PERMITTED EQUIPMENT LIST

THE FOLLOWING IS A LIST OF ALL PERMITS TO CONSTRUCT AND PERMITS TO OPERATE AT THIS FACILITY:

Application Number	Permit Number	Equipment Description
490177	G3379	DUST COLLECTOR
490184		LITHOGRAPHIC PRINTING PRESS, IR/UV DRY
501988		WINDER-JOGGER
521762		LITHOGRAPHIC PRINTING PRESS, IR/UV DRY
521763		LITHOGRAPHIC PRINTING PRESS, IR/UV DRY
521764		LITHOGRAPHIC PRINTING PRESS, IR DRY
521382		FLEXOGRAPHIC PRINTING PRESS – HEAT SET

NOTE: EQUIPMENT LISTED ABOVE THAT HAVE NO CORRESPONDING PERMITS TO OPERATE NUMBER ARE ISSUED PERMITS TO CONSTRUCT. THE ISSUANCE OR DENIAL OF THEIR PERMITS TO OPERATE IS SUBJECT TO ENGINEERING FINAL REVIEW. ANY OTHER APPLICATIONS THAT ARE STILL BEING PROCESSED AND HAVE NOT BEEN ISSUED PERMITS TO CONSTRUCT OR PERMITS TO OPERATE WILL NOT BE FOUND IN THIS TITLE V PERMIT.

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

FACILITY WIDE CONDITION(S)

Condition(s):

- 1. EXCEPT FOR OPEN ABRASIVE BLASTING OPERATIONS, THE OPERATOR SHALL NOT DISCHARGE INTO THE ATMOSPHERE FROM ANY SINGLE SOURCE OF EMISSIONS WHATSOEVER ANY AIR CONTAMINANT FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE MINUTES IN ANY ONE HOUR WHICH IS:
 - A. AS DARK OR DARKER IN SHADE AS THAT DESIGNATED NO. 1 ON THE RINGELMANN CHART, AS PUBLISHED BY THE UNITED STATES BUREAU OF MINES; OR
 - B. OF SUCH OPACITY AS TO OBSCURE AN OBSERVER'S VIEW TO A DEGREE EQUAL TO OR GREATER THAN DOES SMOKE DESCRIBED IN SUBPARAGRAPH (A) OF THIS CONDITION. [RULE 401]
- 2. THE TOTAL QUANTITY OF VOLATILE ORGANIC COMPOUNDS (VOC) EMITTED FROM THIS FACILITY SHALL NOT EXCEED 2165 POUNDS IN ANY ONE DAY.
 [RULE 1303(b)(2)-OFFSET]
- 3. TO MAINTAIN EXEMPTION FROM THE NESHAP REQUIREMENTS, THE TOTAL QUANTITY OF HAZARDOUS AIR POLLUTANT (HAP) EMISSIONS FROM THIS FACILITY SHALL NOT EXCEED 10 TONS (20,000 POUNDS) OF A SINGLE HAP OR 25 TONS (50,000 POUNDS) OF A COMBINATION OF HAPS IN ANY 12 CALENDAR MONTH PERIOD.

 [40CFR63, SUBPART KK]
- 4. IN ADDITION TO THE RECORD KEEPING REQUIREMENTS IN RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS FACILITY TO VERIFY THE VOC/HAP EMISSIONS IN POUNDS AND THE VOC/HAP CONTENT OF EACH MATERIAL AS APPLIED (INCLUDING WATER AND EXEMPT COMPOUNDS).

 [RULE 109, 1303(b)(2)-OFFSET, 40CFR63 SUBPART KK]
- 5. WITHIN 14 CALENDAR DAYS AFTER THE END OF EACH MONTH, THE OPERATOR SHALL TOTAL AND RECORD HAP EMISSIONS FOR THE MONTH FOR ALL EQUIPMENT THAT ARE REQUIRED TO HAVE WRITTEN PERMITS OR ARE EXEMPT FROM WRITTEN PERMITS PURSUANT TO RULE 219 AT THIS FACILITY. THE RECORD SHALL INCLUDE ANY PROCEDURE USED TO ACCOUNT FOR CONTROL DEVICE EFFICIENCIES AND/OR WASTE DISPOSAL. IT SHALL BE SIGNED FOR ACCURACY BY THE HIGHEST RANKING INDIVIDUAL RESPONSIBLE FOR COMPLIANCE WITH DISTRICT RULES. [RULE 109, 1303(b)(2)-OFFSET, 40CFR63 SUBPART KK]
- 6. THE OPERATOR SHALL MAINTAIN A SINGLE LIST WHICH INCLUDES ONLY THE NAME AND ADDRESS OF EACH PERSON FROM WHOM THE FACILITY ACQUIRED HAP-CONTAINING MATERIAL REGULATED BY THE DISTRICT THAT WAS USED OR STORED AT THE FACILITY DURING THE PRECEDING 12 MONTHS.

 [RULE 109, 1303(b)(2)-OFFSET, 40CFR63 SUBPART KK]

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- 7. THE OPERATOR SHALL RETAIN ALL PURCHASE INVOICES FOR ALL HAP-CONTAINING MATERIAL USED OR STORED AT THE FACILITY, AND ALL WASTE MANIFESTS FOR ALL WASTE HAP-CONTAINING MATERIAL REMOVED FROM THE FACILITY FOR FIVE YEARS. [RULE 109, 1303(b)(2)-OFFSET, 40CFR63 SUBPART KK]
- 8. ALL RECORDS REQUIRED BY THIS PERMIT SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, SHALL BE RETAINED AT THE FACILITY FOR AT LEAST FIVE YEARS, AND SHALL BE MADE AVAILABLE TO ANY DISTRICT REPRESENTATIVE UPON REQUEST. [RULE 109, 1303(b)(2)-OFFSET]
- 9. MATERIAL SAFETY DATA SHEETS FOR ALL COATINGS, INKS, AND SOLVENTS USED AT THIS FACILITY SHALL BE KEPT CURRENT AND MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.

[RULE 109, 1303(b)(2)-OFFSET]

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

PERMIT TO OPERATE

Permit No. G3379 A/N 490177

Equipment Description:

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

- 1. DUST COLLECTOR, DUSTKOP, MODEL FT 40-SP, WITH 40 BAGS, 393 SQUARE FEET OF FILTER AREA.
- 2. EXHAUST SYSTEM WITH EXHAUST BLOWER CAPACITY OF 3200 CFM AND 10 H.P. BLOWER MOTOR VENTING A WINDER-JOGGER SYSTEM.

Conditions:

- OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW. [RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
 [RULE 204]
- 3. DUST COLLECTED IN THIS EQUIPMENT SHALL BE DISCHARGED ONLY INTO A CLOSED CONTAINER.
 [RULE 1303(a)(1)-BACT]

Periodic Monitoring:

- 4. THE OPERATOR SHALL PERFORM AN ANNUAL INSPECTION OF THE EQUIPMENT AND FILTER MEDIA FOR LEAKS, BROKEN OR TORN FILTER MEDIA AND IMPROPERLY INSTALLED FILTER MEDIA. THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):
 - A. THE NAME OF THE PERSON PERFORMING THE INSPECTION AND/OR MAINTENANCE OF THE FILTER MEDIA;
 - B. THE DATE, TIME AND RESULTS OF THE INSPECTION; AND
 - C. THE DATE, TIME AND DESCRIPTION OF ANY MAINTENANCE OR REPAIRS RESULTING FROM THE INSPECTION.

[RULE 3004 (a)(4)]

5. THE OPERATOR SHALL CONDUCT AN INSPECTION FOR VISIBLE EMISSIONS FROM ALL STACKS AND OTHER EMISSION POINTS OF THIS EQUIPMENT WHENEVER THERE IS A PUBLIC COMPLAINT OF VISIBLE EMISSIONS, WHENEVER VISIBLE EMISSIONS ARE OBSERVED, AND ON

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AN ANNUAL BASIS, AT LEAST, UNLESS THE EQUIPMENT DID NOT OPERATE DURING THE ENTIRE ANNUAL PERIOD. THE ROUTINE ANNUAL INSPECTION SHALL BE CONDUCTED WHILE THE EQUIPMENT IS IN OPERATION AND DURING DAYLIGHT HOURS. IF ANY VISIBLE EMISSIONS (NOT INCLUDING CONDENSED WATER VAPOR) ARE DETECTED, THE OPERATOR SHALL TAKE CORRECTIVE ACTION(S) THAT ELIMINATES THE VISIBLE EMISSIONS WITHIN 24 HOURS AND REPORT THE VISIBLE EMISSIONS AS A POTENTIAL DEVIATION IN ACCORDANCE WITH THE REPORTING REQUIREMENTS IN SECTION K OF THIS PERMIT.

THE OPERATOR SHALL KEEP THE RECORDS IN ACCORDANCE WITH THE RECORDKEEPING REQUIREMENTS IN SECTION K OF THIS PERMIT AND THE FOLLOWING RECORDS:

- A. STACK OR EMISSION POINT IDENTIFICATION;
- B. DESCRIPTION OF ANY CORRECTIVE ACTIONS TAKEN TO ABATE VISIBLE EMISSIONS; AND
- C. DATE AND TIME VISIBLE EMISSION WAS ABATED.

[RULE 3004 (a)(4)]

Emissions and Requirements:

6. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

PM: 0 PERCENT OPACITY, RULE 1155

PM: RULE 1155

PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

PERMIT TO OPERATE

Permit No. A/N 490184

Equipment Description:

LITHOGRAPHIC PRINTING SYSTEM CONSISTING OF:

- 1. LITHOGRAPHIC PRINTING PRESS, KBA, MODEL RA162-8+L, EIGHT COLOR, 64" WIDTH, SHEET FED WITH A REFRIGERATED FOUNTAIN AND THREE 2 H.P. EXHAUST FANS.
- 2. AQUEOUS COATER
- 3. INFRARED DRYER, AIR MOTION SYSTEMS WITH 9 LAMPS, 72 KW TOTAL.
- 4. ULTRA VIOLET DRYER, AIR MOTION SYSTEMS WITH 8 LAMPS, 211.2 KW TOTAL

Conditions:

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.

 [RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
 [RULE 204]
- 3. THE VOLATILE ORGANIC COMPOUND (VOC) CONTENT OF THE FOUNTAIN SOLUTION USED IN THIS EQUIPMENT SHALL NOT EXCEED 0.5 POUND VOC PER GALLON, AS APPLIED, INCLUDING WATER AND EXEMPT COMPOUNDS.

 [RULE 1303(a)(1)-BACT]
- 4. IN ADDITION TO THE RECORD KEEPING REQUIREMENTS IN RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY THE FOLLOWING:
 - A. DENSITY OF EACH INK, IN POUNDS PER GALLON
 - B. PERCENTAGE BY WEIGHT OF LITHOGRAPHIC OILS IN EACH INK.
 - C. THE INK ABSORPTION FACTOR AS SPECIFIED BY CURRENT DISTRICT GUIDELINES.
 - D. VOC CONTENT OF FOUNTAIN SOLUTIONS, WASH MATERIALS AND ANY OTHER MATERIALS USED IN POUNDS PER GALLON, AS APPLIED, INCLUDING WATER AND EXEMPT COMPOUNDS.
 - E. DAILY VOC EMISSIONS IN POUNDS.

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

F. NAPTHALENE AND FORMALDEHYDE EMISSIONS IN POUNDS PER CALENDAR MONTH AND PER CALENDAR YEAR.

[RULE 109, 1303(b)(2)-OFFSET]

- 5. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE 1 WITH AN EFFECTIVE DATE OF MARCH 7, 2008 OR EARLIER WITH THE EXCEPTION OF STYRENE (CAS# 100-9-0), ACRYLIC ACID (CAS# 79-10-7), ETHYLENE GLYCOL (CAS# 107-21-1), ISOPROPYL ALCOHOL (CAS# 67-63-0), AMMONIA (CAS# 7664-41-7), COPPER AND COPPER COMPOUNDS (CAS# 7664-5-8), NAPHTHALENE (CAS# 91-20-3), FORMALDEHYDE (CAS# 50-00-0), TOLUENE (CAS# 108-88-3), HYDROCHLORIC ACID (CAS# 7647-01-0), ZINC (CAS# 7440-66-6), SODIUM HYDROXIDE (CAS# 1310-73-2), PHOSPHORIC ACID (CAS# 7664-38-2), ETHYLENE GLYCOL MONOBUTYL ETHER (EGBE) (CAS# 111-76-2), XYLENE (CAS# 1330-20-7), AND MANGANESE AND MANGANESE COMPOUNDS (CAS# 7439-97-6).. [RULE 1401]
- 6. THE TOTAL QUANTITY OF NAPHTHALENE (CAS# 91-20-3) CONTAINED IN MATERIALS USED IN THIS EQUIPMENT SHALL NOT EXCEED 3 POUNDS IN ANY CALENDAR YEAR.
 [RULE 1401]
- 7. THE TOTAL QUANTITY OF FORMALDEHYDE (CAS# 50-00-0) CONTAINED IN MATERIALS USED IN THIS EQUIPMENT SHALL NOT EXCEED 8 POUNDS IN ANY CALENDAR YEAR.
 [RULE 1401]

Emissions and Requirements:

8. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 109

VOC: RULE 1130, SEE APPENDIX B FOR EMISSION LIMITS VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

PERMIT TO OPERATE

Permit No. A/N 501988

Equipment Description:

WINDER JOGGER, WOODWARD, MODEL NO. 550, 7'-0" W. X 14'-7" L. X 9'-7" H., WITH ONE 5 H.P. HYDRAULIC PUMP AND A 15-H.P. BLOWER, VENTED TO A DUST COLLECTOR.

Conditions:

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.

 [RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
 [RULE 204]
- 3. THIS EQUIPMENT SHALL NOT BE OPERATED UNLESS IT IS VENTED TO AIR POLLUTION CONTROL EQUIPMENT, WHICH IS IN FULL USE AND WHICH HAS BEEN ISSUED A VALID PERMIT BY THE EXECUTIVE OFFICER.

 [RULE 1303(a)(1)-BACT]

Emissions and Requirements:

4. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS PM: RULE 405, SEE APPENDIX B FOR EMISSION LIMITS

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

PERMIT TO OPERATE

Permit No. A/N 521762

Equipment Description:

LITHOGRAPHIC PRINTING SYSTEM CONSISTING OF:

- 1. LITHOGRAPHIC PRINTING PRESS, PLANETA, MODEL 557P, SEVEN COLOR, 55 INCH SHEET WIDTH.
- 2. INFRARED DRYER, GRAPHIX, 42" W. X 55" L. X 8" H., 62 KW, WITH FOUR ½ H.P. CIRCULATING FANS AND THREE 2 H.P. EXHAUST FANS.
- 3. ULTRA VIOLET DRYER, UV MAN 1ST, TYPE U-1000-3-BOD, 24" W. X 55" L. X 8" H., 19 KW, WITH TWO 1 H.P. EXHAUST FANS.

Conditions:

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.

 [RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES. [RULE 204]
- 3. IN ADDITION TO THE RECORD KEEPING REQUIREMENTS IN RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY THE FOLLOWING:
 - A. DENSITY OF EACH INK IN POUNDS PER GALLON.
 - B. THE PERCENTAGE BY WEIGHT OF LITHOGRAPHIC OILS IN EACH INK.
 - C. THE INK ABSORPTION FACTOR AS SPECIFIED BY CURRENT DISTRICT GUIDELINES.
 - D. THE VOC CONTENT OF FOUNTAIN SOLUTIONS, WASH MATERIALS AND ANY OTHER MATERIALS USED IN POUNDS OF VOC PER GALLON, AS APPLIED, INCLUDING WATER AND EXEMPT COMPOUNDS.
 - E. DAILY VOC EMISSIONS IN POUNDS.
 - F. OTHER DATA AS REQUIRED TO VERIFY COMPLIANCE WITH THE CONDITIONS SPECIFIED IN THIS PERMIT.

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

ALL RECORDS SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, SHALL BE RETAINED ON THE PREMISES FOR AT LEAST FIVE YEARS, AND SHALL BE MADE AVAILABLE UPON REQUEST OF THE EXECUTIVE OFFICER OR HIS REPRESENTATIVE. [RULE 109, 1303(b)(2)-OFFSET]

Emissions and Requirements:

4. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 109

VOC: RULE 1130, SEE APPENDIX B FOR EMISSION LIMITS VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

PERMIT TO OPERATE

Permit No. A/N 521763

Equipment Description:

LITHOGRAPHIC PRINTING PRESS, KOMORI, MODEL L650-111, 6 COLOR, SHEET FED, 50" SHEET WIDTH, WITH A 127 KW INFRARED DRYING SYSTEM, AND A 62 KW ULTRAVIOLET CURING SYSTEM.

Conditions:

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.

 [RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
 [RULE 204]
- 3. THE VOC CONTENT OF THE FOUNTAIN SOLUTION USED IN THIS EQUIPMENT SHALL NOT EXCEED 0.5 POUND VOC PER GALLON, AS APPLIED, INCLUDING WATER AND EXEMPT COMPOUNDS.

 [RULE 1303(a)(1)-BACT]
- 4. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY COMPOUNDS IDENTIFIED AS CARCINOGENIC AIR CONTAMINANTS IN RULE 1401, TABLE I, WITH AN EFFECTIVE DATE OF DECEMBER 7, 1990 OR EARLIER.

 [RULE 1401]
- 5. IN ADDITION TO THE RECORD KEEPING REQUIREMENTS IN RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY THE FOLLOWING:
 - A. DENSITY OF EACH INK IN POUNDS PER GALLON.
 - B. THE PERCENTAGE BY WEIGHT OF LITHOGRAPHIC OILS IN EACH INK.
 - C. THE INK ABSORPTION FACTOR AS SPECIFIED BY CURRENT DISTRICT GUIDELINES.
 - D. THE VOC CONTENT OF FOUNTAIN SOLUTIONS, WASH MATERIALS AND ANY OTHER MATERIALS USED IN POUNDS OF VOC PER GALLON, AS APPLIED, INCLUDING WATER AND EXEMPT COMPOUNDS.
 - E. DAILY VOC EMISSIONS IN POUNDS.

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

F. OTHER DATA AS REQUIRED TO VERIFY COMPLIANCE WITH THE CONDITIONS SPECIFIED IN THIS PERMIT.

[RULE 109, 1303(b)(2)-OFFSET]

Emissions and Requirements:

6. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 109

VOC: RULE 1130, SEE APPENDIX B FOR EMISSION LIMITS VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

PERMIT TO OPERATE

Permit No. A/N 521764

Equipment Description:

LITHOGRAPHIC PRINTING PRESS, KBA-PLANETA, MODEL 162-7, 7 COLOR, SHEET FED, 64" SHEET WIDTH, WITH INFRARED DRYER, 122 KW.

Conditions:

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.

 [RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.

 [RULE 204]
- 3. THE VOC CONTENT OF THE FOUNTAIN SOLUTION USED IN THIS EQUIPMENT SHALL NOT EXCEED 0.5 POUND VOC PER GALLON, AS APPLIED, INCLUDING WATER AND EXEMPT COMPOUNDS.

 [RULE 1303(b)(2)-OFFSET]
- 4. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY COMPOUNDS IDENTIFIED AS CARCINOGENIC AIR CONTAMINANTS IN RULE 1401, TABLE I, WITH AN EFFECTIVE DATE OF DECEMBER 7, 1990 OR EARLIER.

 [RULE 1401]
- 5. IN ADDITION TO THE RECORD KEEPING REQUIREMENTS IN RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY THE FOLLOWING:
 - A. DENSITY OF EACH INK IN POUNDS PER GALLON.
 - B. THE PERCENTAGE BY WEIGHT OF LITHOGRAPHIC OILS IN EACH INK.
 - C. THE INK ABSORPTION FACTOR AS SPECIFIED BY CURRENT DISTRICT GUIDELINES.
 - D. THE VOC CONTENT OF FOUNTAIN SOLUTIONS, WASH MATERIALS AND ANY OTHER MATERIALS USED IN POUNDS OF VOC PER GALLON, AS APPLIED, INCLUDING WATER AND EXEMPT COMPOUNDS.
 - E. DAILY VOC EMISSIONS IN POUNDS.
 - F. OTHER DATA AS REQUIRED TO VERIFY COMPLIANCE WITH THE CONDITIONS SPECIFIED IN THIS PERMIT.

[RULE 109, 1303(b)(2)-OFFSET]

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

Emissions and Requirements:

7. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 109

VOC: RULE 1130, SEE APPENDIX B FOR EMISSION LIMITS VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

PERMIT TO CONSTRUCT

A/N 521382 Granted as of

Equipment Description:

FLEXOGRAPHIC PRINTING SYSTEM CONSISTING OF:

- 1. FLEXOGRAPHIC PRINTING PRESS, ROBINETTE, TWO COLOR, 68" WIDTH, WEB FED.
- 2. DRYER, WITH A 1,600,000 BTU PER HOUR NATURAL GAS FIRED ECLIPSE MINNOX LOW NOX BURNER, WITH ONE 1/3 HP COMBUSTION AIR BLOWER AND ONE 15 HP EXHAUST FAN.

Conditions:

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.

 [RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
 [RULE 204]
- 3. THE TOTAL QUANTITY OF VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS FROM THIS EQUIPMENT SHALL NOT EXCEED 1000 POUNDS IN ANY ONE DAY. [RULE 1303(b)(2) OFFSET]
- 4. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE I, WITH AN EFFECTIVE DATE OF SEPTEMBER 10, 2010 OR EARLIER, WITH THE EXCEPTION OF AMMONIA (CAS# 7664-41-7). [RULE 1401]
- 5. THE OXIDES OF NITROGEN (NOx) EMISSIONS DISCHARGED FROM THIS EQUIPMENT SHALL NOT EXCEED 30 PPM, CALCULATED AS NO_2 BY VOLUME ON A DRY BASIS @ 3% OXYGEN, AVERAGED OVER 30 CONSECUTIVE MINUTES. [RULE 1401]
- 6. THE OWNER OR OPERATOR OF THIS EQUIPMENT SHALL CONDUCT A SOURCE TEST TO VERIFY COMPLIANCE WITH CONDITION NO. 5 AND RULE 1147 UNDER THE FOLLOWING CONDITIONS:
 - A. THE TESTS SHALL BE CONDUCTED WITHIN 45 DAYS AFTER DISTRICT APPROVAL OF THE SOURCE TEST PROTOCOL.
 - B. THE TESTS SHALL MEASURE NOx, CO, OXYGEN CONTENT, MOISTURE CONTENT, TEMPERATURE, AND THE EXHAUST FLOW RATE AT THE OUTLET OF THIS EQUIPMENT, AT THE NORMAL OPERATING LOAD, USING THE APPROPRIATE TEST METHODS

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SPECIFIED IN RULE 1147. THE REPORT SHALL PRESENT THE EMISSION DATA IN POUNDS PER HOUR, AND PARTS PER MILLION ON A DRY BASIS CORRECTED TO 3% OXYGEN.

- C. IN CASE THIS EQUIPMENT OPERATES WITH VARIABLE HEAT INPUT THAT MAY FALL BELOW 50% OF THE RATED HEAT INPUT CAPACITY DURING NORMAL OPERATION, A TEST SHALL ALSO BE CONDUCTED AS SPECIFIED IN SECTION B OF THIS CONDITION ABOVE, BUT USING A HEAT INPUT OF LESS THAN 25% OF THE RATED HEAT INPUT OF THIS EQUIPMENT, PURSUANT TO RULE 1147(d)(1).
- D. A WRITTEN NOTICE OF THE SOURCE TEST DATE SHALL BE SUBMITTED OT THE DISTRICT (ADDRESSED TO THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, ATTN: WILMA WILSON, ENGINEERING & COMPLIANCE, 21865 COPLEY DRIVE, DIAMOND BAR, CA 91765) AT LEAST 14 DAYS PRIOR TO THE SOURCE TEST DATE SO THAT AN OBSERVER FROM THE DISTRICT MAY BE PRESENT.
- E. A TESTING LABORATORY CERTIFIED BY THE CALIFORNIA AIR RESOURCES BOARD IN THE REQUIRED TEST METHODS FOR CIRTERIA POLLUTANTS TO BE MEASURED, AND IN COMPLIANCE WITH DISTRICT RULE 304 (NO CONFLICT OF INTEREST) SHALL CONDUCT THE TEST
 [RULE 1303(a)(1)-BACT]
- 7. SAMPLING FACILITIES SHALL COMPLY WITH THE DISTRICT GUIDELINES FOR CONSTRUCTION OF SAMPLING AND TESTING FACILITIES PURSUANT TO RULE 217. TWO COMPLETE COPIES OF THE SOURCE TEST REPORTS SHALL BE SUBMITTED TO THE DISTRICT WITHIN 45 DAYS AFTER THE SOURCE TESTING DATE. THE SOURCE TEST REPORT SHALL INCLUDE, BUT NOT BE LIMITED TO, ALL TESTING DATA REQUIRED BY THIS CONDITION.

 [RULE 1303(a)(1)-BACT]
- 8. A SOURCE TEST PROTOCOL SHALL BE SUBMITTED TO THE DISTRICT (ADDRESSED TO SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, ATTN: WILMA WILSON, ENGINEERING & COMPLIANCE, 21865 COPLEY DRIVE, DIAMOND BAR, CA 91765) NO LATER THAN 30 DAYS FROM THE DATE THIS PERMIT IS ISSUED, UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT. THE TEST PROTOCOL SHALL BE APPROVED IN WRITING BY THE DISTRICT BEFORE THE TEST COMMENCES. THE TEST PROTOCOL SHALL INCLUDE THE COMPLETED DISTRICT FORMS ST-1 AND ST-2 SPECIFYING THE PROPOSED OPERATING CONDITIONS OF THE EQUPMENT DURING THE TEST, IDENTITY OF THE TESTING LABORATORY, A STATEMENT FROM THE TESTING LABORATORY CERTIFYING IT MEETS THE CRITERIA IN DISTRICT RULE 304(k), AND A DESCRIPTION OF THE SAMPLING AND ANALYTICAL PROCEDURES TO BE USED. [RULE 1303(a)(1)-BACT]
- 9. TWO COMPLETE COPIES OF THE SOURCE TEST REPORTS SHALL BE SUBMITTED TO THE DISTRICT (ADDRESSED TO SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, ATTN: WILMA WILSON, ENGINEERING & COMPLIANCE, 21865 COPLEY DRIVE, DIAMOND BAR, CA 91765) WITHIN 30 DYAS AFTER THE SOURCE TESTING DATE. THE SOURCE TEST REPORT SHALL INCLUDE, BUT NOT BE LIMITED TO, ALL TESTING DATA REQUIRED BY THIS PERMIT. [RULE 1303(a)(1)-BACT]

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

Emissions and Requirements:

10. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 109

VOC: RULE 1130, SEE APPENDIX B FOR EMISSION LIMITS VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

RULE 219 EQUIPMENT

Equipment Description:

RULE 219 EXEMPT EQUIPMENT, COATING EQUIPMENT, PORTABLE, ARCHITECTURAL COATINGS.

Periodic Monitoring:

1. THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

FOR ARCHITECTURAL APPLICATIONS WHERE NO THINNERS, REDUCERS, OR OTHER VOC CONTAINING MATERIALS ARE ADDED, MAINTAIN SEMI-ANNUAL RECORDS OF ALL COATINGS CONSISTING OF (a) COATING TYPE, (b) VOC CONTENT AS SUPPLIED IN GRAMS PER LITER (g/l) OF MATERIALS FOR LOW-SOLIDS COATINGS, AND (c) VOC CONTENT AS SUPPLIED IN g/l OF COATING, LESS WATER AND EXEMPT SOLVENT, FOR OTHER COATING.

2. FOR OTHER ARCHITECTURAL APPLICATIONS WHERE THINNERS, REDUCERS, OR OTHER VOC CONTAINING MATERIALS ARE ADDED, MAINTAIN DAILY RECORDS FOR EACH COATING CONSISTING OF (a) COATING TYPE, (b) VOC CONTENT AS APPLIED IN GRAMS PER LITER (g/l) OF MATERIALS USED FOR LOW-SOLIDS COATINGS, AND (c) VOC CONTENT AS APPLIED IN g/l OF COATING, LESS WATER AND EXEMPT SOLVENT, FOR OTHER COATING. [RULE 3004 (a)(4)]

Emissions and Requirements:

3. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATION:

VOC: RULE 1113, SEE APPENDIX B FOR EMISSION LIMITS VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

RULE 219 EQUIPMENT

Equipment Description:

RULE 219 EXEMPT EQUIPMENT, HAND WIPING OPERATION.

Emissions and Requirements:

1. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATION:

VOC: RULE 109

VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

RULE 219 EQUIPMENT

Equipment Description:

RULE 219 EXEMPT EQUIPMENT, NATURAL GAS-FIRED WATER HEATER, BOILER, OR PROCESS HEATER, > 1 MM BTU/HR BUT < 2 MM BTU/HR.

Emissions and Requirements:

1. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

PM: 0.1 gr/scf, RULE 409 NOx: 30 PPMV, RULE 1146.2 CO: 400 PPMV, RULE 1146.2 CO: 2000 PPMV, RULE 407

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

RULE 219 EQUIPMENT

Equipment Description:

RULE 219 EXEMPT EQUIPMENT, AIR CONDITIONING UNITS

Emissions and Requirements:

1. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

REFRIGERANT: RULE 1415

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FACILITY PERMIT TO OPERATE GRAPHIC PACKAGING INTERNATIONAL, INC.

RULE 219 EQUIPMENT

Equipment Description:

RULE 219 EXEMPT EQUIPMENT, LAMINATING EQUIPMENT, LOW USE OR EMISSIONS.

Emissions and Requirements:

1. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 109

VOC: RULE 1168, SEE APPENDIX B FOR EMISSION LIMITS VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS